Deadline: 6/6/07 Noon

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To:

State Water Board

Sacramento, Ca



MEETING. SPECIFIC COMMENT WITH REGARD TO THE RESOLUTION TO PROHIBIT SUBSURFACE WASTE DISPOSAL SYSTEMS IN THE

QUAIL VALLEY AREA OF RIVERSIDE COUNTY CALIFORNIA.

Please ensure the Water Board receives these comments with regard to the septic system issue in quail valley for the meeting on June 19.

I am a builder of low-income housing in Riverside County. CLM Corporation's mission is to seek out low cost property and construct conventional built (wood frame, cement slab) single family homes for low income families. We work with Riverside County to help them meet their requirement for such housing in the County.

We have built more single family homes in the Quail Valley area than any other builder and could be considered experts in the conditions, environment, and demographics in the valley. Do to the septic system issues in the valley, CLM has reduced its construction and land holdings there where we now have only one lot left to build out for a low-income single family residence. So we have no further personal interest in making comments today. In fact we have offered information and data to the agencies involved.

We are quite aware of the reasons septic systems have failed in the valley but the Water Quality Control Board and Riverside County Health have not made all the statistics available to the public. Because CLM Corp has properly designed homes and employed engineers, and properly permitted all its construction, there has never been a septic system failure. We have been onsite almost ever day for the last 5 years and can address the issues. Most system failures can be traced back to several contributing factors. Some of these factors include, extremely old systems and not built to more common code, numerous extended family members overburdening a small system which was designed for 2 people, illegal systems which were neither permitted nor built correctly, and a factor I see all too often, is incorrectly installed systems which are then cemented over or structures built on top of them. It only takes a big rain and these inadequate systems fail. Riverside Country has done virtually nothing to address the "specific" causal factors for the failures but instead is waiting for a moratorium as the answer.

The point to be made is that systems can be properly engineered, legally installed, and work correctly for years. NOT ALL SEPTIC SYSTEMS WILL FAIL IN QUAIL VALLEY. There has been great fear about septic systems and even the County Health



Dept. is paralyzed to do anything. I have been waiting 2 ½ years for a septic system approval where it should have taken 3 weeks. The system meets all current requirements but the County Health dept. fears a failure but has no data to support their position.

More homework needs to be accomplished. I can help with on-site observations. A moratorium right now will hurt low-income families from having a home and is a bit of an overkill. I recommend the agencies involved reveal the actual causal factors and start enforcing existing laws. There are some properties which would be inversely condemned. The costs to the County and State might be considerable. A little more review is indicated before applying a moratorium as the answer.

Thank you